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*Attorneys for Defendant
NETFLIX, INC.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No.: 4:22-cv-01490-JST

**DECLARATION OF RACHAEL
LAMKIN ISO NETFLIX, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER PLAINTIFF'S
MATERIAL SHOULD BE SEALED**

Judge: Hon. Jon S. Tigar

I, Rachael Lamkin, declare as follows:

1. I am counsel of record for Defendant Netflix, Inc.
2. I am an attorney licensed to practice law in all state and federal courts in California, the Eastern District of Texas, Colorado federal court, the Court of International Trade, the International Trade Commission, the Federal Circuit Court of Appeals, and this Honorable Court.
3. I have personal knowledge of all facts recited herein and state that such facts are true and correct to my knowledge or information and belief, and, if called upon to do so, I would testify competently about them.
4. I have reviewed and complied with Judge Tigar's Standing Order Governing Administrative Motions to File Materials Under Seal.

1 5. I have reviewed and complied with Civil Local Rule 79-5, including the requirement
2 to file separate motions if a party seeks to file under seal a document containing “portions that more
3 than one party bears the burden of showing is sealable.” Civil L.R. 79-5(f)(5).

4 6. Attached as Exhibit A to the accompanying Motion is a true and correct copy of an
5 email from Eric Morehouse to Sally Fan dated June 12, 2023 and identified as DOC-000154294 from
6 the court-ordered forensic discovery of AiPi.

7 7. Attached as Exhibit B to the accompanying Motion is a true and correct copy of a
8 machine-translated bank statement of CDN Licensing Oy dated April 29, 2022, bates CUVTA000102.

9 8. Attached as Exhibit C to the accompanying Motion is a true and correct copy of a
10 machine-translated bank statement of CDN Licensing Oy dated July 30, 2022, bates CUVTA000109.

11 9. Attached as Exhibit D to the accompanying Motion is a true and correct copy of an
12 email from William Ramey to Eric Morehouse dated August 13, 2023 and identified as DOC-
13 000002323 from the court-ordered forensic discovery of AiPi.

14 10. Attached as Exhibit E to the accompanying Motion is a true and correct copy of an
15 email from Onni Hietlahti to Lauri Valjakka and Matti Sarahelmo, bates CUVTA000226.

16 11. Attached as Exhibit F to the accompanying Motion is a true and correct copy of an
17 email from Lauri Valjakka to Onni Hietlahti dated November 9, 2022, bates CUVTA000231.

18 12. Attached as Exhibit G to the accompanying Motion is a true and correct copy of a Bond
19 agreement between CDN Licensing Oy and Scarabaeus Sacer Oy dated November 5, 2021, bates
20 CUVTA000091.

21 13. Attached as Exhibit H to the accompanying Motion is a true and correct copy of an
22 email from Onni Hietlahti to Lauri Valjakka and Matti Sarahelmo, bates CUVTA000234.

23 14. Attached as Exhibit I to the accompanying Motion is a true and correct copy of an email
24 from Erick Robinson to Eric Morehouse dated November 13, 2021 and identified as DOC-000129137
25 from the court-ordered forensic discovery of AiPi.

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27 I declare under penalty of perjury under the laws of the United States of America that the
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1 foregoing is true and correct to the best of my knowledge.

2 Executed on August 21, 2025 in San Francisco, California.

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5 By: /s/ Rachael Lamkin
6 Rachael Lamkin
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